

Durell, Daniel

From: Mike Blanchard <mikeblanchard@Butchboydlawfirm.com>
Sent: Wednesday, December 14, 2022 10:28 AM
To: Foster, Dave; Butch Boyd; mike@gld-law.com; Sandy Murray
Cc: Durell, Daniel; Mowrey, Robert T.; LeRae Karn; Jillian Scherrer
Subject: RE: William Snyder and Shirley Snyder v. Wells Fargo Bank, N.A. - Case 01-22-0002-8877

**** External Email -- Sender: mikeblanchard@butchboydlawfirm.com ****

Dave, please feel free to file as is. Thank you for circulating this.

From: Foster, Dave <dfoster@lockelord.com>
Sent: Wednesday, December 14, 2022 10:25 AM
To: Mike Blanchard <mikeblanchard@Butchboydlawfirm.com>; Butch Boyd <butchboyd@butchboydlawfirm.com>; mike@gld-law.com; Sandy Murray <sandymurray@Butchboydlawfirm.com>
Cc: Durell, Daniel <daniel.durell@lockelord.com>; Mowrey, Robert T. <rmowrey@lockelord.com>; LeRae Karn <LeraeKarn@Butchboydlawfirm.com>; Jillian Scherrer <JillianScherrer@Butchboydlawfirm.com>
Subject: RE: William Snyder and Shirley Snyder v. Wells Fargo Bank, N.A. - Case 01-22-0002-8877

Mike, Attached is an updated draft. I accepted your revisions but made tweaks to paragraph 7 (adding the requested language Jim sent after the initial draft was circulated) and paragraph 9 (deferring the issue of whether attorney fees are recoverable and setting up briefing schedule if asserted). Please let me know if you have any other requested edits or if I am authorized to file as is. Thanks.

From: Mike Blanchard <mikeblanchard@Butchboydlawfirm.com>
Sent: Wednesday, December 14, 2022 9:49 AM
To: Foster, Dave <dfoster@lockelord.com>; Butch Boyd <butchboyd@butchboydlawfirm.com>; mike@gld-law.com; Sandy Murray <sandymurray@Butchboydlawfirm.com>
Cc: Durell, Daniel <daniel.durell@lockelord.com>; Mowrey, Robert T. <rmowrey@lockelord.com>; LeRae Karn <LeraeKarn@Butchboydlawfirm.com>; Jillian Scherrer <JillianScherrer@Butchboydlawfirm.com>
Subject: RE: William Snyder and Shirley Snyder v. Wells Fargo Bank, N.A. - Case 01-22-0002-8877

**** External Email -- Sender: mikeblanchard@butchboydlawfirm.com ****

Dave, I'm re-sending the attached and copying LeRae Karn and Jillian Scherrer at our office. Would you please include them on case related emails? Thanks.

From: Mike Blanchard
Sent: Wednesday, December 14, 2022 9:47 AM
To: 'Foster, Dave' <dfoster@lockelord.com>; Butch Boyd <butchboyd@butchboydlawfirm.com>; mike@gld-law.com; Sandy Murray <sandymurray@Butchboydlawfirm.com>
Cc: Durell, Daniel <daniel.durell@lockelord.com>; Mowrey, Robert T. <rmowrey@lockelord.com>
Subject: RE: William Snyder and Shirley Snyder v. Wells Fargo Bank, N.A. - Case 01-22-0002-8877

Dave, attached please find minor proposed revisions. If you're good with them, please feel free to file.

From: Foster, Dave <dfoster@lockelord.com>
Sent: Wednesday, December 14, 2022 8:15 AM
To: Mike Blanchard <mikeblanchard@Butchboydlawfirm.com>; Butch Boyd <butchboyd@butchboydlawfirm.com>; mike@gld-law.com; Sandy Murray <sandymurray@Butchboydlawfirm.com>
Cc: Durell, Daniel <daniel.durell@lockelord.com>; Mowrey, Robert T. <rmowrey@lockelord.com>
Subject: RE: William Snyder and Shirley Snyder v. Wells Fargo Bank, N.A. - Case 01-22-0002-8877

Mike, Following up. Dave

From: Foster, Dave
Sent: Friday, December 9, 2022 12:13 PM
To: 'Mike Blanchard' <mikeblanchard@Butchboydlawfirm.com>; 'Butch Boyd' <butchboyd@butchboydlawfirm.com>; 'mike@gld-law.com' <mike@gld-law.com>; 'Sandy Murray' <sandymurray@Butchboydlawfirm.com>
Cc: Durell, Daniel <daniel.durell@lockelord.com>; Mowrey, Robert T. <rmowrey@lockelord.com>
Subject: RE: William Snyder and Shirley Snyder v. Wells Fargo Bank, N.A. - Case 01-22-0002-8877

Mike, Just circling back on the below/ attached. Thanks. Dave

From: Foster, Dave
Sent: Monday, December 5, 2022 9:00 AM
To: 'Mike Blanchard' <mikeblanchard@Butchboydlawfirm.com>; 'Butch Boyd' <butchboyd@butchboydlawfirm.com>; 'mike@gld-law.com' <mike@gld-law.com>; 'Sandy Murray' <sandymurray@Butchboydlawfirm.com>
Cc: Durell, Daniel <daniel.durell@lockelord.com>; Mowrey, Robert T. <rmowrey@lockelord.com>
Subject: RE: William Snyder and Shirley Snyder v. Wells Fargo Bank, N.A. - Case 01-22-0002-8877

Good morning, Mike. Hope you had a good weekend. Just a friendly follow up on the attached to see if you had any edits. Thanks. Dave

B. David L. Foster
Locke Lord LLP
600 Congress Avenue, Suite 2200
Austin, Texas 78701
512-305-4751 Direct
512-305-4800 Fax
dfoster@lockelord.com
www.lockelord.com

From: Foster, Dave
Sent: Wednesday, November 30, 2022 10:52 AM
To: 'Mike Blanchard' <mikeblanchard@Butchboydlawfirm.com>; Butch Boyd <butchboyd@butchboydlawfirm.com>; mike@gld-law.com; Sandy Murray <sandymurray@Butchboydlawfirm.com>
Cc: Durell, Daniel <daniel.durell@lockelord.com>; Mowrey, Robert T. <rmowrey@lockelord.com>
Subject: RE: William Snyder and Shirley Snyder v. Wells Fargo Bank, N.A. - Case 01-22-0002-8877

Mike, Thanks for the below draft parameters. Attached is a draft sample scheduling order. A few highlights:

- We agree to 1 and 3-6 below and tried to include all but 6 in the attached. 50 RFPs seems heavy. We were originally thinking in the 15-20 range. How about 25?

- We included a proposed initial disclosure deadline of 12/15. Disclosures should hopefully limit the amount of rogs and RFPs needed
- We include proposed expert designation deadlines of 3/1 and 4/14
- Costs per arbitration agreement provisions (para. 9)
- Proposed pleadings deadline of 12/9

I believe we covered these yesterday:

- Hearing 6/6
- Dispositive motions briefing schedule: 14 days for a response and 7 days for a reply
- Discovery cutoff of 4/22
- Witness Designations of 5/8
- Depo Designations and Cross-Designations of 5/16 and 5/23
- Exhibit/Depo Objections due 5/26
- Agreed Confidentiality and Protective Order to be submitted in 14 days (para. 7). We will take the lead in drafting for review.

Please let me know if you have any questions or concerns. Happy to jump on a quick call to go over these as needed.

Dave

B. David L. Foster
Locke Lord LLP
512-305-4751 Direct
dfoster@lockelord.com

From: Mike Blanchard <mikeblanchard@Butchboydlawfirm.com>

Sent: Wednesday, November 30, 2022 8:59 AM

To: Foster, Dave <dfoster@lockelord.com>; Butch Boyd <butchboyd@butchboydlawfirm.com>; mike@gld-law.com;
Sandy Murray <sandymurray@Butchboydlawfirm.com>

Cc: Durell, Daniel <daniel.durell@lockelord.com>; Mowrey, Robert T. <rmowrey@lockelord.com>

Subject: RE: William Snyder and Shirley Snyder v. Wells Fargo Bank, N.A. - Case 01-22-0002-8877

**** External Email -- Sender: mikeblanchard@butchboydlawfirm.com ****

All, following please find proposed discovery parameters:

1. Interrogatories – 15 per side
2. Requests for production – 50 per side
3. Depositions – 4 hours per side per deposition. Depositions to take place at an agreed location.
4. Both sides acknowledge third party discovery is necessary.
5. Agreed protective order
6. Parties will confer re: ESI search terms

Best,
Mike

From: Foster, Dave <dfoster@lockelord.com>

Sent: Tuesday, November 29, 2022 9:22 AM

To: Mike Blanchard <mikeblanchard@Butchboydlawfirm.com>; Butch Boyd <butchboyd@butchboydlawfirm.com>;

mike@gld-law.com; Sandy Murray <sandymurray@Butchboydlawfirm.com>

Cc: Durell, Daniel <daniel.durell@lockelord.com>; Mowrey, Robert T. <rmowrey@lockelord.com>

Subject: RE: William Snyder and Shirley Snyder v. Wells Fargo Bank, N.A. - Case 01-22-0002-8877

Thanks, Mike. I'll circulate a calendar invitation for 2. Please let me know if another time works better. Dave

From: Mike Blanchard <mikeblanchard@Butchboydlawfirm.com>

Sent: Tuesday, November 29, 2022 8:12 AM

To: Foster, Dave <dfoster@lockelord.com>; Butch Boyd <butchboyd@butchboydlawfirm.com>; mike@gld-law.com; Sandy Murray <sandymurray@Butchboydlawfirm.com>

Cc: Durell, Daniel <daniel.durell@lockelord.com>; Mowrey, Robert T. <rmowrey@lockelord.com>

Subject: Re: William Snyder and Shirley Snyder v. Wells Fargo Bank, N.A. - Case 01-22-0002-8877

**** External Email -- Sender: mikeblanchard@butchboydlawfirm.com ****

Dave, I'm available any time from 1-5. Thanks.

From: Foster, Dave <dfoster@lockelord.com>

Sent: Monday, November 28, 2022 5:46:40 PM

To: Butch Boyd <butchboyd@butchboydlawfirm.com>; mike@gld-law.com <mike@gld-law.com>; Sandy Murray <sandymurray@Butchboydlawfirm.com>; Mike Blanchard <mikeblanchard@Butchboydlawfirm.com>

Cc: Durell, Daniel <daniel.durell@lockelord.com>; Mowrey, Robert T. <rmowrey@lockelord.com>

Subject: RE: William Snyder and Shirley Snyder v. Wells Fargo Bank, N.A. - Case 01-22-0002-8877

All, Please let me know if you have time tomorrow to visit about the AAA sample scheduling order in advance of Wednesday's initial conference. Thanks. Dave Foster

B. David L. Foster

Locke Lord LLP

600 Congress Avenue, Suite 2200

Austin, Texas 78701

512-305-4751 Direct

512-305-4800 Fax

dfoster@lockelord.com

www.lockelord.com

From: NathanielSorber@adr.org <NathanielSorber@adr.org>

Sent: Tuesday, November 22, 2022 12:45 PM

To: Mowrey, Robert T. <rmowrey@lockelord.com>; butchboyd@butchboydlawfirm.com

Cc: mike@gld-law.com; sandymurray@butchboydlawfirm.com; mikeblanchard@Butchboydlawfirm.com; Blankenship, Denise <dblankenship@lockelord.com>; Durell, Daniel <daniel.durell@lockelord.com>; Foster, Dave <dfoster@lockelord.com>

Subject: William Snyder and Shirley Snyder v. Wells Fargo Bank, N.A. - Case 01-22-0002-8877

**** External Email -- Sender: prvs=132580c63e=nathanielsorber@adr.org ****

Hello,

Please review the attached correspondence regarding the above-referenced case.

Feel free to contact me with any questions, comments or concerns you have related to this matter.

Thank you.



**AAA Nathaniel Sorber
Case Administrator II**

American Arbitration Association

T: 559 475 6269 E: NathanielSorber@adr.org
45 E River Park Place West, Suite 308, Fresno, CA 93720
adr.org | icdr.org | aaamediation.org



The information in this transmittal (including attachments, if any) is privileged and/or confidential and is intended only for the recipient(s) listed above. Any review, use, disclosure, distribution or copying of this transmittal is prohibited except by or on behalf of the intended recipient. If you have received this transmittal in error, please notify me immediately by reply email and destroy all copies of the transmittal. Thank you.

Atlanta | Austin | Boston | Brussels | Chicago | Cincinnati | Dallas | Hartford | Houston | London | Los Angeles | Miami | New Orleans | New York | Newark | Providence | San Francisco | Stamford | Washington DC | West Palm Beach

For more information visit www.lockelord.com

CONFIDENTIALITY NOTICE:

This e-mail and any attached files from Locke Lord LLP may contain information that is privileged, confidential and/or exempt from disclosure under applicable law. If you are not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you received this e-mail by accident, please notify the sender immediately and destroy this e-mail and all copies of it. We may scan and or monitor emails sent to and from our servers to ensure regulatory compliance to protect our clients and business.